

IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

Daren K. Johnston and	:	
Melinda S. Johnston	:	Case No. 19-70641-JAD
Debtors	:	
	:	
	:	Chapter 13
	:	
Lakeview Loan Servicing LLC	:	
Movant	:	
	:	Regarding Claim No. 18
	:	
vs.	:	
	:	
Ronda J. Winnecour, Esq.	:	
Chapter 13 Trustee	:	
	:	
Additional Respondent	:	

**DECLARATION REGARDING NOTICE OF MORTGAGE PAYMENT CHANGE**

**NOW COME** the Debtors, Daren K. Johnston and Melinda S. Johnston, by and through their attorney, Richard G. Allen, Esquire, of the law offices of Richard G. Allen, and files the within Declaration Regarding Monthly Payment Change, and in support thereof aver as follows:

1. The Debtors are Daren K. Johnston and Melinda S. Johnston, adult individuals presently residing at 1960 Rt 553 Hwy, Penn Run, PA 15765.
2. Counsel for the Debtors is Richard G. Allen, Esq.
3. The mortgage lender and/or servicer for the Debtor's residence is Lakeview Loan Servicing LLC ("Lakeview").

4. The new post-petition monthly payment payable to Lakeview is \$784.89, effective with the December 1<sup>st</sup>, 2024 payment, per the Notice of Mortgage Payment Change filed on October 28th, 2024.
5. Debtors' counsel has reviewed the existing Plan, recomputed the plan payment and concludes the existing plan payment is sufficient to fund the plan even with the new debt added. Currently it is month 61 of the Plan term.

Dated: November 22nd, 2024:

**/s/ Richard G. Allen, Esquire**

Richard G. Allen, Esquire

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Attorney for Debtors